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MICHAEL ALEXANDER

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL ALEXANDER, an
Individual,
Plaintiff,

vs.

COREY CHADWICK, an Individual;
DOE Individuals and ROE Entities 1-10.

Defendant.

COREY CHADWICK, an Individual,
Counterclaimant

vs.

MICHAEL ALEXANDER, an
Individual,
Counterdefendant.

CASE NO.: 2:22-cv-01084-CDS-BNW

**JOINT STATEMENT REGARDING
DISCOVERY**

[FIRST REQUEST]

COMES NOW, Plaintiff MICHAEL ALEXANDER (hereinafter “Mr. Alexander”), by and through his counsel, JOHN W. THOMSON, ESQ., and COREY CHADWICK (hereinafter “Mr. Chadwick”), by and through his counsel, KATHLEEN BLISS, Esq. and ERNEST LEONARD, (collectively the “Parties”), and hereby submit this Joint Statement Regarding Discovery as follows:

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I. STATEMENT OF RELEVANT FACTS

Plaintiff and Defendant entered into a contractual agreement, wherein Defendant would trade 250 Bitcoin belonging to Plaintiff and the Parties would share the profits among other terms. Plaintiff's claims are: 1) breach of contract; 2) Breach of implied Covenant of Good Faith and Fair Dealing; 3) Breach of Fiduciary Duties; 4) Accounting; 5) Fraud; 6) Replevin; 7) Securities violations; 8) Declaratory Relief; 9) Constructive Trust; 10) Conversion; 11) Negligence; and 12) Unjust Enrichment.

Defendant filed a Motion to Dismiss on September 19, 2022. Because the Motion has not yet been decided by the Court, the Defendant filed an Answer and Counterclaim on March 20, 2023 for Declaratory Judgment.

The parties filed a Stipulated Discovery Plan and Scheduling Order which was accepted on November 1, 2022. Docket #16. The Stipulated Discovery Plan set forth the following dates for discovery:

- A. Last date to complete discovery: June 16, 2023.
- B. Last date to amend pleadings and add parties: March 20, 2023.
- C. Last date to disclose experts pursuant to Fed. R. Civ. P. 26(a)(2): April 17, 2023;
- D. Last date to disclose rebuttal experts: May 17, 2023;
- E. Last date to file dispositive motions: July 17, 2023;
- F. Last date to file joint pretrial order: August 16, 2023;
- G. Last date for Alternative Dispute Resolution: July 3, 2023;

i. Statement of Discovery Currently Completed.

The Parties have engaged in discovery in good faith. Plaintiff and Defendant have exchanged their initial disclosures and have been working together to resolve the Parties' issues.

1 The Parties have been in discussions about further document exchanges and wish to receive and
2 analyze these additional documents before sending formal written discovery, retaining expert
3 witnesses, and conducting depositions. In addition, the Parties are looking at convenient dates
4 for a mediation after documents are exchanged, but before depositions are taken.

5 **ii. Specific Description of the Discovery that Remains to be**
6 **Completed.**
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8 The parties anticipate conducting depositions issuing subpoenas, and exchanging written
9 discovery.

10 **1. Parties Proposed New Discovery Schedule**

- 11 a. Last day to complete discovery: September 14, 2023.
12 b. Last date to disclose experts pursuant to Fed. R. Civ. P.
13 26(a)(2): Monday, July 17, 2023.¹
14 c. Last date to disclose rebuttal experts: Wednesday,
15 August 16, 2023.
16 d. Last date to file dispositive motions: Monday, October
17 16, 2023
18 e. Last date to file joint pretrial order: Tuesday, November
19 14, 2023.
20 f. Last date for Alternative Dispute Resolution: Monday,
21 October 2, 2023.
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¹ Sunday, July 16, 2023 is a Sunday.

DATED this 17th day of April, 2023.

THOMSON LAW PC

/s/ John W. Thomson, Esq.

JOHN W. THOMSON, ESQ.

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FRIEDMAN & FEIGER, L.L.P.

/s/ Ernest Leonard, Esq.

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Admitted Pro Hac Vice

Attorneys for Defendant, Corey Chadwick

ORDER

IT IS SO ORDERED

DATED: 10:32 am, April 18, 2023



BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE